January 21, 2015

Advice Letter 4551-E

Meredith Allen  
Senior Director, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, CA  94177

Subject: Electrical Capacity Procurement Limits and Ratable Rates in PG&E’s Bundled Procurement Plan

Dear Ms. Allen:

Advice Letter 4551-E is effective December 17, 2014.

Sincerely,

Edward Randolph  
Director, Energy Division
December 17, 2014

Advice 4551-E
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject:** Electrical Capacity Procurement Limits and Ratable Rates in Pacific Gas and Electric Company’s Bundled Procurement Plan

**Introduction**

Pacific Gas and Electric Company (“PG&E”) hereby submits to the California Public Utilities Commission (“Commission” or “CPUC”) this advice letter filing to address electrical capacity procurement limits and ratable rates in PG&E’s approved Bundled Procurement Plan (“BPP”).

**Background**

On October 11, 2012, the Commission issued Resolution E-4544, which approved PG&E’s BPP consistent with Decisions (“D.”) 12-01-033 and 12-04-046. PG&E’s BPP establishes electrical capacity procurement limits and ratable rates that apply to electric capacity transactions with deliveries beyond the prompt calendar year. The BPP provides that PG&E will file an “annual (or more frequent, if necessary) update to its electrical capacity procurement limit and ratable rates in a Tier 1 advice letter during the years which PG&E does not file an updated conformed bundled procurement plan.”


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1 BPP, Sheet Nos. 43-44.
2 BPP, Sheet No. 44.
On October 3, 2014, in Phase 2 on the 2014 LTPP Proceeding, PG&E filed its proposed 2014 BPP. PG&E put forth updated capacity procurement limits, as well as the addition of electric energy, natural gas, and greenhouse gas compliance instrument procurement limits, as part of its proposed 2014 BPP.

PG&E is awaiting further Commission or Administrative Law Judge action or guidance in Phase 2 of the 2014 LTPP.

Discussion

In this Advice Letter, PG&E has adjusted the previously approved ratable rates to account for approved procurement since Advice Letter 4289-E was filed, but is not proposing any updates be made to its approved electrical capacity procurement limits. A revised Table PGE-3 is included in confidential Attachment A and B. PG&E proposes that any further updates to its BPP procurement limits be made as part of Phase 2 of the 2014 LTPP Proceeding.

Confidentiality

In support of this Advice Letter, PG&E submits Confidential Appendices A and B in the manner directed by D.08-04-023 and the August 22, 2006, Administrative Law Judge’s Ruling Clarifying Interim Procedures for Complying with D.06-06-066 to demonstrate the confidentiality of the material and to invoke the protection of confidential utility information provided under General Order 66-C and Public Utilities Code Section 454.5(g). A separate Declaration Seeking Confidential Treatment is being filed concurrently with this Advice Letter.

Confidential Appendices

Appendix A Redlined Sheet 106 of PG&E’s Bundled Procurement Plan

Appendix B Clean Sheet 106 of PG&E’s Bundled Procurement Plan

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, by facsimile or electronically any of which must be received no later than January 6, 2015, which is twenty days from the date of this filing. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. Protests should be mailed to:

3 Confidential Workpapers supporting the updated ratable rates are available upon request.
CPUC Energy Division  
Attention: Tariff Unit, 4th Floor  
505 Van Ness Avenue  
San Francisco, CA, 94102

Facsimile: (415) 703-2200  
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of the protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest should also be sent via U.S. mail (and by facsimile and electronically, if possible) to PG&E at the address shown below on the same date it is mailed or delivered to the Commission:

Meredith Allen  
Senior Director, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, California 94177

Facsimile: (415) 973-7226  
E-mail: PGETariffs@pge.com

**Tier Designation**

PG&E is designating this as a Tier 1 Advice Letter, in accordance with the BPP.

**Effective Date**

PG&E requests that this advice letter become effective December 17, 2014.

**Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the service lists for R.12-03-014 and R.13-12-010. Address changes to the General Order 96-B list and electronic approvals should be directed to PGETariffs@pge.com. For changes to any other service list, please contact the Commission’s Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Advice letter filings can also be accessed electronically at: http://www.pge.com/tariffs.
/S/
Meredith Allen
Senior Director – Regulatory Relations

cc: Energy Division Tariff Unit, Energy Division
    Service List for R.12-03-014
    Service List for R.13-12-010
**CALIFORNIA PUBLIC UTILITIES COMMISSION**

**ADVICE LETTER FILING SUMMARY**

**ENERGY UTILITY**

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

### Pacific Gas and Electric Company (ID U39 E)

<table>
<thead>
<tr>
<th>Utility type:</th>
<th>Contact Person: Jennifer Wirowek</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑ ELC</td>
<td>Phone #: (415) 973-1419</td>
</tr>
<tr>
<td>☐ GAS</td>
<td>E-mail: <a href="mailto:J6ws@pge.com">J6ws@pge.com</a> and <a href="mailto:PGETariffs@pge.com">PGETariffs@pge.com</a></td>
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<tr>
<td>☐ PLC</td>
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<tr>
<td>☐ HEAT</td>
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<tr>
<td>☐ WATER</td>
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</table>

**EXPLANATION OF UTILITY TYPE**

ELC = Electric
GAS = Gas
PLC = Pipeline
HEAT = Heat
WATER = Water

**Advice Letter (AL) #: 4551-E**

**Tier: 1**

**Subject of AL:** Electrical Capacity Procurement Limits and Ratable Rates in Pacific Gas and Electric Company’s Bundled Procurement Plan

**Keywords (choose from CPUC listing):** Procurement

**AL filing type:** ☑ One-Time ☐ Monthly ☐ Quarterly ☐ Annual ☐ Other

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.12-01-033 and D.12-04-046

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: 

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for: Yes, see Confidential Declaration and Matrix

Confidential information will be made available to those who have executed a nondisclosure agreement: ☑ Yes ☐ No

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: Elizabeth Ingram (415) 973-8613

Resolution Required? ☐ Yes ☑ No

Requested effective date: **December 17, 2014**

No. of tariff sheets: N/A

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed: N/A

Pending advice letters that revise the same tariff sheets: N/A

Protests, dispositions, and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

**California Public Utilities Commission**

Energy Division
EDTariffUnit
505 Van Ness Ave., 4th Flr.
San Francisco, CA 94102
E-mail: EDTariffUnit@cpuc.ca.gov

**Pacific Gas and Electric Company**

Attn: Meredith Allen
Senior Director, Regulatory Relations
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177
E-mail: PGETariffs@pge.com
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

DECLARATION OF ELIZABETH INGRAM
SEEKING CONFIDENTIAL TREATMENT
FOR CERTAIN DATA AND INFORMATION
CONTAINED IN PG&E'S ADVICE LETTER 4551-E

I, Elizabeth Ingram, declare:

1. I am a Principal in the Portfolio Management Department within the Energy Procurement Organization at Pacific Gas and Electric Company (PG&E). In this position, my responsibilities include overseeing commercial and compliance activities. This declaration is based on my personal knowledge of PG&E’s procurement practices and my understanding of the Commission’s decisions protecting the confidentiality of market-sensitive information concerning electric procurement of an investor-owned utility.

2. Based on my knowledge and experience, and in accordance with the “Administrative Law Judge’s Ruling Clarifying Interim Procedures For Complying With Decision 06-06-066,” issued in Rulemaking 05-06-040 on August 22, 2006, I make this declaration seeking confidential treatment for Advice Letter 4551-E which addresses electrical capacity procurement limits and ratable rates in PG&E’s Bundled Procurement Plan.

3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes data and information covered by General Order (GO)-66-C, Section 2.2b, which would place PG&E in an unfair business disadvantage if disclosed; and Public Utilities Code Section 454.5(g), which would reveal market sensitive information. The matrix also specifies why confidential protection is justified. Finally, the matrix specifies that: (1) the information is not already public; and (2) the data cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure. By this reference, I
am incorporating into this declaration all of the explanatory text that is pertinent to my testimony in the attached matrix.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on December 17, 2014 at San Francisco, California.

[Signature]

Elizabeth Ingram
### IDENTIFICATION OF CONFIDENTIAL INFORMATION

<table>
<thead>
<tr>
<th>Redaction Reference</th>
<th>1) Constitutes data listed in Appendix 1 to D.06-06-066 (Y/N)</th>
<th>2) Data correspond to category in Appendix 1:</th>
<th>3) Complies with limitations of D.06-06-066 (Y/N)</th>
<th>4) Data not already public (Y/N)</th>
<th>5) The data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure (Y/N)</th>
<th>PG&amp;E's Justification for Confidential Treatment</th>
<th>Length of Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Advice Letter 4551-E Attachment A and B</td>
<td></td>
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</tr>
<tr>
<td>Table PGE-3</td>
<td>N</td>
<td></td>
<td>N/A</td>
<td>Y</td>
<td>Y</td>
<td>This information discloses PG&amp;E's procurement limits and ratable rates for electrical capacity. The release of this commercially sensitive information could cause harm to PG&amp;E's customers and put PG&amp;E at an unfair business disadvantage if this information was disclosed and then used by market participants to gain an insight into PG&amp;E's procurement needs and thus gain a commercial advantage. In addition, this information is similar to the type of procurement information that is confidential and protected under D.06-06-066, Section VI.A: Utility Bundled Net Open (Long or Short) Position for Capacity (MW),</td>
<td>No quantification in GO 66-C and PUC Section 454.5(g)</td>
</tr>
</tbody>
</table>
AT&T
Albion Power Company
Alcantar & Kahl LLP
Anderson & Poole
BART
Barkovich & Yap, Inc.
Bartle Wells Associates
Braun Blaising McLaughlin, P.C.
CENERGY POWER
California Cotton Ginners & Growers Assn
California Energy Commission
California Public Utilities Commission
California State Association of Counties
Calpine
Casner, Steve
Center for Biological Diversity
City of Palo Alto
City of San Jose
Clean Power
Coast Economic Consulting
Commercial Energy
Cool Earth Solar, Inc.
County of Tehama - Department of Public Works
Crossborder Energy
Davis Wright Tremaine LLP
Day Carter Murphy
Defense Energy Support Center
Dept of General Services
Division of Ratepayer Advocates
Douglass & Liddell
Downey & Brand
Ellison Schneider & Harris LLP
G. A. Krause & Assoc.
GenOn Energy Inc.
GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz & Ritchie
Green Power Institute
Hanna & Morton
In House Energy
International Power Technology
Intestate Gas Services, Inc.
K&L Gates LLP
Kelly Group
Linde
Los Angeles County Integrated Waste Management Task Force
Los Angeles Dept of Water & Power
MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McKenna Long & Aldridge LLP
McKenzie & Associates
Modesto Irrigation District
Morgan Stanley
NLine Energy, Inc.
NRG Solar
Nexant, Inc.
Occidental Energy Marketing, Inc.
OnGrid Solar
Pacific Gas and Electric Company
Praxair
Regulatory & Cogeneration Service, Inc.
SCD Energy Solutions
SCE
SDG&E and SoCalGas
SPURR
Seattle City Light
Sempra Utilities
SoCalGas
Southern California Edison Company
Spark Energy
Sun Light & Power
Sunshine Design
Tecogen, Inc.
Tiger Natural Gas, Inc.
TransCanada
Utility Cost Management
Utility Power Solutions
Utility Specialists
Verizon
Water and Energy Consulting
Wellhead Electric Company
Western Manufactured Housing
Communities Association (WMA)
YEP Energy